

REMARKS

In the non-final Office Action, the Examiner rejects claims 1 and 3 under 35 U.S.C. § 103(a) as unpatentable over FLETCHER et al. (Reg. No. H1,897) in view of KAWAGOE et al. (U.S. Patent No. 5,961,595) or HEBERT (U.S. Patent No. 6,134,618); rejects claims 2-8 under 35 U.S.C. § 103(a) as unpatentable over STONE et al. (U.S. Patent No. 6,421,737) in view of KAWAGOE et al. (U.S. Patent No. 5,961,595) or HEBERT (U.S. Patent No. 6,134,618); and rejects claims 9-16 under 35 U.S.C. § 103(a) as unpatentable over STONE et al. (U.S. Patent No. 6,421,737) in view of KAWAGOE et al. (U.S. Patent No. 5,961,595) or HEBERT (U.S. Patent No. 6,134,618) and further in view of BARKER et al. (U.S. Publication No. 2001/0052006) or ALFIERI et al. (U.S. Patent No. 5,666,486). Applicants respectfully traverse these rejections. Claims 1-20 remain pending.

At the outset, Applicants note that the Examiner does not address claims 17-20 in the non-final Office Action. Applicants respectfully request that the Examiner address these claims in the next Office Action. Moreover, Applicants respectfully request that the next Office Action be made non-final due to the incomplete examination of Applicants' application in the present Office Action.

Claims 1 and 3 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over FLETCHER et al. in view of KAWAGOE et al. Applicants respectfully traverse this rejection.

Claim 1 is directed to a computer in a telecommunications network including a processor; and a resource management means for enabling the processor to provide

standardized management of multiple resources including internal operational resources, external components, and applications processing data. The resource management means comprises one or more resource managers. The resource managers being one of a semaphore resource manager, a switch controller resource manager, an agent resource manager, a call data block resource manager, a service logic resource manager, or a switch resource resource manager. Each of the resource managers comprises one or more resource manager application program interfaces that manage the internal operational resources, the external components, and the applications processing data; and one or more data storing means for enabling the processor to store data in table format related to the internal operational resources, the external components, and the applications processing data. The application interfaces manipulate the data to reflect the current resource state. FLETCHER et al. and KAWAGOE et al., whether taken alone or in any reasonable combination, do not disclose or suggest this combination of features.

For example, FLETCHER et al. and KAWAGOE et al. do not disclose or suggest a resource management means for enabling the processor to provide standardized management of multiple resources including internal operational resources, external components, and applications processing data. The Examiner appears to rely on some element within FLETCHER et al.'s call processor 40 for allegedly corresponding to the recited resource management means (Office Action, pg. 2). Applicants respectfully disagree with the Examiner's interpretation of FLETCHER et al.

As illustrated in Fig. 2 of FLETCHER et al., call processor 40 includes a call processing application 54, a signaling application 56, a resource manager application 58,

and a system controller application 94. FLETCHER et al. discloses that call processing application 54 includes an authentication center 42, a home location register 44, a visitor location register 46, a mobile switching center 48, and a base station controller 50 (Fig. 2, col. 8, lines 59-64). FLETCHER et al. in no way discloses or suggests that call processing application 54 or any of its subcomponents 42, 44, 46, 48, or 50 enables a processor to provide standardized management of multiple resources including internal operational resources, external components, and applications processing data, as recited in claim 1.

FLETCHER et al. discloses that signaling application 56 provides SS7 functionality to call processing application 54 so that the integrated wireless telecommunications system 14 will have SS7 connectivity to the PLMN 16 and the PSTN 18 (col. 11, lines 54-60). FLETCHER et al. in no way discloses or suggests that signaling application 56 enables a processor to provide standardized management of multiple resources including internal operational resources, external components, and applications processing data, as recited in claim 1.

FLETCHER et al. discloses that resource manager application 58 manages and allocates the resources of the resource assembly 60 with respect to the call processor 40 and enables different applications of the call processor 40 to interface with resources of the resource assembly 60 (col. 12, lines 49-55). FLETCHER et al. in no way discloses or suggests that resource manager application 58 enables a processor to provide standardized management of multiple resources, as recited in claim 1. Therefore, FLETCHER et al. cannot disclose or suggest that resource manager application 58

enables a processor to provide standardized management of multiple resources including internal operational resources, external components, and applications processing data, as recited in claim 1.

FLETCHER et al. discloses that system controller application 94 is responsible for ensuring that the call processor 40 is operating properly by periodically testing the other applications of the call processor 40 (col. 11, lines 42-45). FLETCHER et al. in no way discloses or suggests that system controller application 94 enables a processor to provide standardized management of multiple resources including internal operational resources, external components, and applications processing data, as recited in claim 1.

The disclosure of KAWAGOE et al. does not remedy the above deficiencies in the disclosure of FLETCHER et al.

FLETCHER et al. and KAWAGOE et al. do not further disclose or suggest a resource management means that includes one or more resource managers, where each resource manager includes one or more data storing means for enabling the processor to store data in table format related to the internal operational resources, the external components, and the applications processing data, as also recited in claim 1. The Examiner admits that FLETCHER et al. does not disclose this feature and relies on KAWAGOE et al. for allegedly disclosing "keeping track of resource status in a table format" (Office Action, pp. 3-4). Applicants submit that the Examiner has misinterpreted the disclosure of KAWAGOE et al.

KAWAGOE et al. is directed to a network management system for managing hardware with hardware resource management modules shared between networks (col. 1,

lines 8-11). Contrary to the Examiner's allegation, KAWAGOE et al. does not disclose or suggest a resource manager that keeps track of resource status in a table format. In fact, the KAWAGOE et al. disclosure does not even mention the term "status" or "table." More importantly, KAWAGOE et al. in no way discloses or suggests a resource manager that includes one or more data storing means for enabling a processor to store data in table format related to the internal operational resources, the external components, and the applications processing data, as recited in claim 1. If this rejection is maintained, Applicants respectfully request that the Examiner specifically point out where in KAWAGOE et al. this feature is disclosed.

Even assuming, for the sake of argument, that the disclosure of KAWAGOE et al. could reasonably be construed to disclose the above feature of claim 1, Applicants submit that it would not have been obvious to one skilled in the art at the time of Applicants' invention to incorporate this alleged teaching of KAWAGOE et al. into the FLETCHER et al. system, absent impermissible hindsight.

With respect to motivation, the Examiner alleges "it would have been obvious ... to incorporate the teaching of either one of the secondary references into that of Fletcher thus providing uniformity, reducing cost and providing flexibility when making changing" (Office Action, pg. 4). Applicants submit that the Examiner's motivation is merely a conclusory statement regarding an alleged benefit of the combination. Such motivation has repeatedly been found to be insufficient for establishing a *prima facie* case of obviousness.

Moreover, the Examiner does not explain why incorporating KAWAGOE et al.'s

alleged teaching of a resource manager that includes one or more data storing means for enabling a processor to store data in table format related to the internal operational resources, the external components, and the applications processing data into the FLETCHER et al. system would provide uniformity, reduce costs, or provide flexibility. In fact, the Examiner does not explain with respect to what uniformity would be provided, what costs would be reduced, or what type of flexibility would be provided. Instead, the Examiner simply presents an argument with no supporting facts. The Examiner does not point to any section of FLETCHER et al., KAWAGOE et al., or any other reference that would lead one skilled in the art to make the conclusion that incorporating KAWAGOE et al.'s alleged teaching of a resource manager that includes one or more data storing means for enabling a processor to store data in table format related to the internal operational resources, the external components, and the applications processing data into the FLETCHER et al. system would provide uniformity, reduce costs, or provide flexibility. Applicants submit that the Examiner's motivation for combining FLETCHER et al. and KAWAGOE et al. is based on impermissible hindsight.

For at least the foregoing reasons, Applicants submit that claim 1 is patentable over FLETCHER et al. and KAWAGOE et al., whether taken alone or in any reasonable combination.

Independent claim 3 recites features similar to features described above with respect to claim 1. Therefore, claim 3 is patentable over FLETCHER et al. and KAWAGOE et al., whether taken alone or in any reasonable combination, for at least reasons similar to reasons given above with respect to claim 1.

Claims 1 and 3 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over FLETCHER et al. in view of HEBERT. Applicants respectfully traverse this rejection.

Claim 1 is directed to a computer in a telecommunications network including a processor; and a resource management means for enabling the processor to provide standardized management of multiple resources including internal operational resources, external components, and applications processing data. The resource management means comprises one or more resource managers. The resource managers being one of a semaphore resource manager, a switch controller resource manager, an agent resource manager, a call data block resource manager, a service logic resource manager, or a switch resource resource manager. Each of the resource managers comprises one or more resource manager application program interfaces that manage the internal operational resources, the external components, and the applications processing data; and one or more data storing means for enabling the processor to store data in table format related to the internal operational resources, the external components, and the applications processing data. The application interfaces manipulate the data to reflect the current resource state. FLETCHER et al. and HEBERT, whether taken alone or in any reasonable combination, do not disclose or suggest this combination of features.

For example, FLETCHER et al. and HEBERT do not disclose or suggest a resource management means for enabling a processor to provide standardized management of multiple resources including internal operational resources, external components, and applications processing data. The Examiner appears to rely on some

element within FLETCHER et al.'s call processor 40 for allegedly corresponding to the recited resource management means (Office Action, pg. 2). Applicants respectfully disagree with the Examiner's interpretation of FLETCHER et al.

As illustrated in Fig. 2 of FLETCHER et al., call processor 40 includes a call processing application 54, a signaling application 56, a resource manager application 58, and a system controller application 94. FLETCHER et al. discloses that call processing application 54 includes an authentication center 42, a home location register 44, a visitor location register 46, a mobile switching center 48, and a base station controller 50 (Fig. 2, col. 8, lines 59-64). FLETCHER et al. in no way discloses or suggests that call processing application 54 or any of its subcomponents 42, 44, 46, 48, or 50 enables a processor to provide standardized management of multiple resources including internal operational resources, external components, and applications processing data, as recited in claim 1.

FLETCHER et al. discloses that signaling application 56 provides SS7 functionality to call processing application 54 so that the integrated wireless telecommunications system 14 will have SS7 connectivity to the PLMN 16 and the PSTN 18 (col. 11, lines 54-60). FLETCHER et al. in no way discloses or suggests that signaling application 56 enables a processor to provide standardized management of multiple resources including internal operational resources, external components, and applications processing data, as recited in claim 1.

FLETCHER et al. discloses that resource manager application 58 manages and allocates the resources of the resource assembly 60 with respect to the call processor 40

and enables different applications of the call processor 40 to interface with resources of the resource assembly 60 (col. 12, lines 49-55). FLETCHER et al. in no way discloses or suggests that resource manager application 58 enables a processor to provide standardized management of multiple resources, as recited in claim 1. Therefore, FLETCHER et al. cannot disclose or suggest that resource manager application 58 enables a processor to provide standardized management of multiple resources including internal operational resources, external components, and applications processing data, as recited in claim 1.

FLETCHER et al. discloses that system controller application 94 is responsible for ensuring that the call processor 40 is operating properly by periodically testing the other applications of the call processor 40 (col. 11, lines 42-45). FLETCHER et al. in no way discloses or suggests that system controller application 94 enables a processor to provide standardized management of multiple resources including internal operational resources, external components, and applications processing data, as recited in claim 1.

The disclosure of HEBERT does not remedy the above deficiencies in the disclosure of FLETCHER et al.

FLETCHER et al. and HEBERT do not further disclose or suggest a resource management means that includes one or more resource managers, where each resource manager includes one or more data storing means for enabling the processor to store data in table format related to the internal operational resources, the external components, and the applications processing data, as also recited in claim 1. The Examiner admits that FLETCHER et al. does not disclose this feature and relies on HEBERT for allegedly

disclosing this feature (Office Action, pp. 3-4). Applicants submit that the Examiner has misinterpreted the disclosure of HEBERT.

HEBERT is directed to a universal host-to-switch application program interface (Abstract). Contrary to the Examiner's allegation, HEBERT does not disclose or suggest a resource manager that includes one or more data storing means for enabling a processor to store data in table format related to the internal operational resources, the external components, and the applications processing data, as recited in claim 1. If this rejection is maintained, Applicants respectfully request that the Examiner specifically point out where in HEBERT the recited resource manager, processor, and data storing means is disclosed.

Even assuming, for the sake of argument, that the disclosure of HEBERT could reasonably be construed to disclose the above feature of claim 1, Applicants submit that it would not have been obvious to one skilled in the art at the time of Applicants' invention to incorporate this alleged teaching of HEBERT into the FLETCHER et al. system, absent impermissible hindsight.

With respect to motivation, the Examiner alleges "it would have been obvious ... to incorporate the teaching of either one of the secondary references into that of Fletcher thus providing uniformity, reducing cost and providing flexibility when making changing" (Office Action, pg. 4). Applicants submit that the Examiner's motivation is merely a conclusory statement regarding an alleged benefit of the combination. Such motivation has repeatedly been found to be insufficient for establishing a *prima facie* case of obviousness.

Moreover, the Examiner does not explain why incorporating HEBERT's alleged teaching of a resource manager that includes one or more data storing means for enabling a processor to store data in table format related to the internal operational resources, the external components, and the applications processing data into the FLETCHER et al. system would provide uniformity, reduce costs, or provide flexibility. In fact, the Examiner does not explain with respect to what uniformity would be provided, what costs would be reduced, or what type of flexibility would be provided. Instead, the Examiner simply presents an argument with no supporting facts. The Examiner does not point to any section of FLETCHER et al., HEBERT, or any other reference that would lead one skilled in the art to make the conclusion that incorporating HEBERT's alleged teaching of a resource manager that includes one or more data storing means for enabling a processor to store data in table format related to the internal operational resources, the external components, and the applications processing data into the FLETCHER et al. system would provide uniformity, reduce costs, or provide flexibility. Applicants submit that the Examiner's motivation for combining FLETCHER et al. and HEBERT is based on impermissible hindsight.

For at least the foregoing reasons, Applicants submit that claim 1 is patentable over FLETCHER et al. and HEBERT, whether taken alone or in any reasonable combination.

Independent claim 3 recites features similar to features described above with respect to claim 1. Therefore, claim 3 is patentable over FLETCHER et al. and HEBERT, whether taken alone or in any reasonable combination, for at least reasons

similar to reasons given above with respect to claim 1.

Claims 2-8 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over STONE et al. in view of KAWAGOE et al. Applicants respectfully traverse this rejection.

At the outset, Applicants note that the rejection of claims 4 and 5 is improper. Claims 4 and 5 depend from claim 1. The Examiner rejects claim 1 under 35 U.S.C. § 103(a) based on FLETCHER et al. and KAWAGOE et al. and based on FLETCHER et al. and HEBERT. Therefore, any rejection of a claim that depends from claim 1 must be based on FLETCHER et al. The Examiner, however, rejects claims 4 and 5 under 35 U.S.C. 103(a) based on STONE et al. and KAWAGOE et al. Therefore, this rejection is improper.

Independent claim 2 is directed to a method for managing resources within a network. The method includes sending a query to a resource manager, wherein the resource manager manages information corresponding to a resource, and where the resource manager complies with a common standard for resource managers within the network. The method further includes managing data stored in memory and organized in table format using the query, including manipulating the data to reflect the current resource state. The data is one of semaphore data, switch controller data, agent data, call data block data, service logic program data, or switch data. STONE et al. and KAWAGOE et al., whether taken alone or in any reasonable combination, do not disclose or suggest this combination of features.

For example, STONE et al. and KAWAGOE et al. do not disclose or suggest

sending a query to a resource manager that complies with a common standard for resource managers within the network. The Examiner relies on STONE et al. for allegedly disclosing this feature (Office Action, pg. 4). Applicants respectfully disagree.

STONE et al. is directed to a user interface that allows a user to specify resources within a computing system to be monitored (Abstract and col. 3, lines 29-32). STONE et al. in no way discloses or suggests that resource monitoring manager 15 (Fig. 1) complies with a common standard for resource managers within a network. The Examiner does not address this feature in the Office Action. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 2.

The disclosure of KAWAGOE et al. does not remedy the above deficiency in the disclosure of STONE et al.

STONE et al. and KAWAGOE et al. do not further disclose or suggest manipulating data stored in memory and organized in table format using the query, as also recited in claim 2. The Examiner admits that STONE et al. does not disclose this feature and relies on KAWAGOE et al. for allegedly disclosing "keeping track of resource status in a table format" (Office Action, pp. 4-5). Applicants submit that the Examiner has misinterpreted the disclosure of KAWAGOE et al.

KAWAGOE et al. is directed to a network management system for managing hardware with a hardware resource management modules shared between networks (col. 1, lines 8-11). Contrary to the Examiner's allegation, KAWAGOE et al. does not disclose or suggest a resource manager that keeps track of resource status in a table format. In fact, the KAWAGOE et al. disclosure does not even mention the term "status" or "table."

More importantly, KAWAGOE et al. in no way discloses or suggests manipulating data stored in memory and organized in table format using the query, as also recited in claim

2. If this rejection is maintained, Applicants respectfully request that the Examiner specifically point out where in KAWAGOE et al. this feature is disclosed.

Even assuming, for the sake of argument, that the disclosure of KAWAGOE et al. could reasonably be construed to disclose the above feature of claim 2, Applicants submit that it would not have been obvious to one skilled in the art at the time of Applicants' invention to incorporate this alleged teaching of KAWAGOE et al. into the FLETCHER et al. system, absent impermissible hindsight.

With respect to motivation, the Examiner alleges "it would have been obvious ... to incorporate the teaching of either one of the secondary references into that of Fletcher thus providing uniformity, reducing cost and providing flexibility when making changing" (Office Action, pg. 4). At the outset, Applicants assume the Examiner intended to reference STONE et al. and not FLETCHER et al.

Nonetheless, Applicants submit that the Examiner's motivation is merely a conclusory statement regarding an alleged benefit of the combination. Such motivation has repeatedly been found to be insufficient for establishing a *prima facie* case of obviousness.

Moreover, the Examiner does not explain why incorporating KAWAGOE et al.'s alleged teaching of manipulating data stored in memory and organized in table format using the query into the STONE et al. system would provide uniformity, reduce costs, or provide flexibility. In fact, the Examiner does not explain with respect to what

uniformity would be provided, what costs would be reduced, or what type of flexibility would be provided. Instead, the Examiner simply presents an argument with no supporting facts. The Examiner does not point to any section of STONE et al., KAWAGOE et al., or any other reference that would lead one skilled in the art to make the conclusion that incorporating KAWAGOE et al.'s alleged teaching of manipulating data stored in memory and organized in table format using the query into the STONE et al. system would provide uniformity, reduce costs, or provide flexibility. Applicants submit that the Examiner's motivation for combining STONE et al. and KAWAGOE et al. is based on impermissible hindsight.

For at least the foregoing reasons, Applicants submit that claim 1 is patentable over STONE et al. and KAWAGOE et al., whether taken alone or in any reasonable combination.

Claims 6 and 7 depend from claim 2. Therefore, these claims are patentable over STONE et al. and KAWAGOE et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 2.

Independent claim 3 recites features similar to features described above with respect to claim 2. Therefore, claim 3 is patentable over STONE et al. and KAWAGOE et al., whether taken alone or in any reasonable combination, for at least reasons similar to reasons given above with respect to claim 2.

Claim 8 depends from claim 3. Therefore, this claim is patentable over STONE et al. and KAWAGOE et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 3.

Claims 2-8 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over STONE et al. in view of HEBERT. Applicants respectfully traverse this rejection.

At the outset, Applicants note that the rejection of claims 4 and 5 is improper. Claims 4 and 5 depend from claim 1. The Examiner rejects claim 1 under 35 U.S.C. § 103(a) based on FLETCHER et al. and KAWAGOE et al. and based on FLETCHER et al. and HEBERT. Therefore, any rejection of a claim that depends from claim 1 must be based on FLETCHER et al. The Examiner, however, rejects claims 4 and 5 under 35 U.S.C. 103(a) based on STONE et al. and HEBERT. Therefore, this rejection is improper.

Independent claim 2 is directed to a method for managing resources within a network. The method includes sending a query to a resource manager, wherein the resource manager manages information corresponding to a resource, and where the resource manager complies with a common standard for resource managers within the network. The method further includes managing data stored in memory and organized in table format using the query, including manipulating the data to reflect the current resource state. The data is one of semaphore data, switch controller data, agent data, call data block data, service logic program data, or switch data. STONE et al. and HEBERT, whether taken alone or in any reasonable combination, do not disclose or suggest this combination of features.

For example, STONE et al. and HEBERT do not disclose or suggest sending a query to a resource manager that complies with a common standard for resource managers within the network. The Examiner relies on STONE et al. for allegedly

disclosing this feature (Office Action, pg. 4). Applicants respectfully disagree.

STONE et al. is directed to a user interface that allows a user to specify resources within a computing system to be monitored (Abstract and col. 3, lines 29-32). STONE et al. in no way discloses or suggests that resource monitoring manager 15 (Fig. 1) complies with a common standard for resource managers within a network. The Examiner does not address this feature in the Office Action. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 2.

The disclosure of HEBERT does not remedy the above deficiency in the disclosure of STONE et al.

STONE et al. and HEBERT do not further disclose or suggest manipulating data stored in memory and organized in table format using the query, as also recited in claim 2. The Examiner admits that STONE et al. does not disclose this feature and relies on HEBERT for allegedly disclosing this feature (Office Action, pp. 5-6). Applicants submit that the Examiner has misinterpreted the disclosure of HEBERT.

HEBERT is directed to a universal host-to-switch application program interface (Abstract). Contrary to the Examiner's allegation, HEBERT does not disclose or suggest manipulating data stored in memory and organized in table format using the query, as recited in claim 2. If this rejection is maintained, Applicants respectfully request that the Examiner specifically point out where HEBERT discloses this feature of claim 2.

Even assuming, for the sake of argument, that the disclosure of HEBERT could reasonably be construed to disclose the above feature of claim 2, Applicants submit that it would not have been obvious to one skilled in the art at the time of Applicants' invention

to incorporate this alleged teaching of HEBERT into the STONE et al. system, absent impermissible hindsight.

With respect to motivation, the Examiner alleges "it would have been obvious ... to incorporate the teaching of either one of the secondary references into that of Fletcher thus providing uniformity, reducing cost and providing flexibility when making changing" (Office Action, pg. 6). Applicants assume that the Examiner intended to reference STONE et al. and not FLETCHER et al.

Nonetheless, Applicants submit that the Examiner's motivation is merely a conclusory statement regarding an alleged benefit of the combination. Such motivation has repeatedly been found to be insufficient for establishing a *prima facie* case of obviousness.

Moreover, the Examiner does not explain why incorporating HEBERT's alleged teaching of manipulating data stored in memory and organized in table format using the query into the STONE et al. system would provide uniformity, reduce costs, or provide flexibility. In fact, the Examiner does not explain with respect to what uniformity would be provided, what costs would be reduced, or what type of flexibility would be provided. Instead, the Examiner simply presents an argument with no supporting facts. The Examiner does not point to any section of STONE et al., HEBERT, or any other reference that would lead one skilled in the art to make the conclusion that incorporating HEBERT's alleged teaching of manipulating data stored in memory and organized in table format using the query into the STONE et al. system would provide uniformity, reduce costs, or provide flexibility. Applicants submit that the Examiner's motivation for

combining STONE et al. and HEBERT is based on impermissible hindsight.

For at least the foregoing reasons, Applicants submit that claim 2 is patentable over STONE et al. and HEBERT, whether taken alone or in any reasonable combination.

Claims 6 and 7 depend from claim 2. Therefore, these claims are patentable over STONE et al. and HEBERT, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 2.

Independent claim 3 recites features similar to features described above with respect to claim 2. Therefore, claim 3 is patentable over STONE et al. and HEBERT, whether taken alone or in any reasonable combination, for at least reasons similar to reasons given above with respect to claim 2.

Claim 8 depends from claim 3. Therefore, this claim is patentable over STONE et al. and HEBERT, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 3.

Claims 9-16 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over STONE et al. in view of KAWAGOE et al., and further in view of BARKER et al. Applicants respectfully traverse this rejection.

Claims 9-16 depend from claim 3. The disclosure of BARKER et al. does not remedy the deficiencies in the disclosures of STONE et al. and KAWAGOE et al. set forth above with respect to claim 3. Therefore, claims 9-16 are patentable over STONE et al., KAWAGOE et al., and BARKER et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 3.

Claims 9-16 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable

over STONE et al. in view of KAWAGOE et al., and further in view of ALFIERI et al.

Applicants respectfully traverse this rejection.

Claims 9-16 depend from claim 3. The disclosure of ALFIERI et al. does not remedy the deficiencies in the disclosures of STONE et al. and KAWAGOE et al. set forth above with respect to claim 3. Therefore, claims 9-16 are patentable over STONE et al., KAWAGOE et al., and ALFIERI et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 3.

Claims 9-16 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over STONE et al. in view of HEBERT, and further in view of BARKER et al.

Applicants respectfully traverse this rejection.

Claims 9-16 depend from claim 3. The disclosure of BARKER et al. does not remedy the deficiencies in the disclosures of STONE et al. and HEBERT set forth above with respect to claim 3. Therefore, claims 9-16 are patentable over STONE et al., HEBERT, and BARKER et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 3.

Claims 9-16 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over STONE et al. in view of HEBERT, and further in view of ALFIERI et al.

Applicants respectfully traverse this rejection.

Claims 9-16 depend from claim 3. The disclosure of ALFIERI et al. does not remedy the deficiencies in the disclosures of STONE et al. and HEBERT set forth above with respect to claim 3. Therefore, claims 9-16 are patentable over STONE et al., HEBERT, and ALFIERI et al., whether taken alone or in any reasonable combination, for

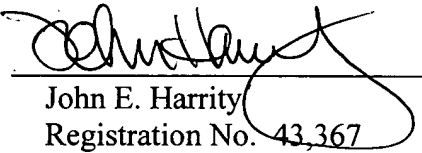
at least the reasons given above with respect to claim 3.

In view of the foregoing remarks, Applicants respectfully request the Examiner's reconsideration of this application, and the timely allowance of the pending claims.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 13-2491 and please credit any excess fees to such deposit account.

Respectfully submitted,

HARRITY & SNYDER, L.L.P.

By: 
John E. Harrity
Registration No. 43,367

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11240 Waples Mill Road
Suite 300
Fairfax, Virginia 22030
(571) 432-0800